

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Complaint of

Democratic Senatorial Campaign Committee

MUR 3774

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
SEP 13 2 23 PM '95

**ANSWER OF RESPONDENT COALITIONS FOR AMERICA, INC.
TO INTERROGATORIES AND REQUESTS FOR DOCUMENTS**

1. Mr. Eric Licht, President, Coalitions for America, Inc. ("CFA"), at all times material, 717 Second Street N.E., Washington, D.C. 20002; and Mrs. Rosemary Swanson, Comptroller, CFA, at all times material, 717 Second Street N.E., Washington, D.C. 20002. Mr. Licht operates CFA and performs the usual duties of a corporate president. Mrs. Swanson is in charge of the books of CFA and performs the usual duties of a comptroller.

2(a). See ¶2(b), supra.

2(b). CFA is a conservative umbrella organization which, inter alia, sponsors meetings of leaders in conservative thought and causes; sponsored¹ limited-viewer television programs, *Family Forum* or *Family Form Live* and *Empowerment Outreach* or *Empowerment Outreach*

¹ Since discontinued.

Live; and makes monetary grants to conservative thought and action organizations.² In 4Q92 Mr. Curt Anderson was Coalitions Director, National Republican Senatorial Committee ("NRSC"). Mr. Anderson and Mr. Licht know one another. In the course of conversations over probably several years, Mr. Licht from time to time had asked Mr. Anderson if NRSC would donate to CFA inasmuch as CFA understood that NRSC had made various donations and CFA always could use further funds for CFA's grants to conservative entities. Mr. Anderson eventually expressed the opinion that he thought he could obtain donations from NRSC to CFA and in due course did so.

2(c). CFA does not maintain records of conversations. There were various conversations in 1992 and other years between Messrs. Licht and Anderson. Most of these had nothing to do with a possible donation. However, some did, in the sense that, as stated in ¶2(b), supra, Mr. Licht from time to time did ask Mr. Anderson if NRSC would donate to CFA. There is no means to pinpoint a particular date or conversation which related to these two 1992 donations. There is no document relating to any such conversation. Although it is debatable whether the actual checks and accompanying transmittal letters would be said to *relate* to the conversations, CFA attaches photocopies of the two checks and of the two letters of transmittal.

ATTACHMENTS ONE - FOUR.

2(d). CFA maintains four accounts - (1) an *operating* account and (2) a *payroll* account, each at National Capital Bank, Washington, D.C.; (3) an *operating* account, in the Rushmore

² But not to political candidates or committees.

[illegible][illegible]

2(f). No. It is possible that Mr. Licht at some point in time may have mentioned to Mr. Anderson one or more of the foregoing three CFA grants, although Mr. Licht has no such recollection.

3. There is no documentation except the two checks and the two transmittal letters, ¶ 2(c), supra.

4. CFA during 4Q92 continued to produce its monthly television programs and, thus, during the period October 1 - November 25, 1992 produced two each of such programs.³ Under separate cover, the video tapes are furnished herewith. *ATTACHMENTS SIX (Empowerment Outreach) AND SEVEN (Family Forum)*. These programs were part of an ongoing series and were not substantially changed in format or type of content during 4Q92. Subsequent to 1992, the technical quality of the programs became more sophisticated; the format and type of content continued essentially the same after, as before and during, 4Q92. As the tapes clearly reveal, the programs were not related to the Georgia (or any other) election.

5. The persons with the most knowledge of the subject matter are Mr. Licht and, to the limited extent of funds processing, Mrs. Swanson, ¶1, supra.

³ October 13, 1992 - *Empowerment Outreach*.
October 20, 1992 - *Family Forum*.
November 10, 1992 - *Empowerment Outreach*.
November 12, 1992 - *Family Forum*.

The first half of each is CFA-sponsored.

ERIC M. LICHT

ERIC M. LICHT

Commonwealth of Virginia }
City of Falls Church } ss

Subscribed and sworn to before me this 13th day of September, 1995.

Jacquelyn P. Harris
Notary Public

My commission expires December 31, 1999.

MARION EDWYN HARRISON, ESQUIRE
LAW OFFICES MARION EDWYN HARRISON
107 Park Washington Court
Falls Church, Virginia 22046
Telephone: 703 532-0303
Facsimile: 703 532-0086
Counsel for Coalitions for America, Inc.

C:\WP50\BRIEFS\DISCOVER\INT-ANS.CFA

ATTACHMENT ONE

11-20-2007 06:01

20.04.397.0695

NATIONAL REPUBLICAN SENATORIAL
COMMITTEE

NON-FEDERAL EXPENDITURES
425 2ND ST., NE.
WASHINGTON, DC 20002

SIGNET BANK
Virginia

1180

OCTOBER 20 1992 68-408/560 1411

PAY**FIFTY THOUSAND AND 00/100***** DOLLARS **50,000.00**

TO
THE
ORDER
OF

COALITIONS FOR AMERICA
717 2ND STREET NE
WASHINGTON, DC 20002

James H. ...

⑈00001180⑈ ⑆055004089⑆ 652⑈016994⑈

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE
NON-FEDERAL EXPENDITURES

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS NOT VALID FOR PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT REQUIRED.

DATE

10/20/92

DELUXE - FORM WYCP-2 V-2

DESCRIPTION

TRANSFER 02-7840 -- 50,000.00

AMOUNT

50,000.00

ATTACHMENT TWO

20.04.2007.0506

2010 Office
Sgt J. P. A. Adams, N.Y.
Washington DC 20013

DATE 11/12/1992

CURRENCY	COIN	DOLLARS	CENTS
LIST EACH CHECK			
WATL REPURCH		40,000.00	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
DEPT		40,000.00	

15-35
540

TOTAL
ITEMS

PLEASE BE SURE ALL ITEMS
ARE PROPERLY ENDORSED.

ALFANE
SUTTA
PEYLA

40, 977/87

TOTAL DEPOSIT
DEPOSITS MAY NOT BE AVAILABLE
FOR IMMEDIATE WITHDRAWAL

FUND FOR GOVT INVESTORS

COA-14-42-631-000

1:054000551: 864 20 844" 01

CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE PROVISIONS OF THE UNIFORM COMMERCIAL CODE OR ANY APPLICABLE COLLECTION AGREEMENT.

**NATIONAL REPUBLICAN SENATORIAL
COMMITTEE**

NON-FEDERAL EXPENDITURES

425 2ND ST., NE.

WASHINGTON, DC 20002

SIGNET BANK

Y2020L-VA

1186

NOVEMBER 11 1992

62-4018/580 1411

PAY ***FORTY THOUSAND AND 00/100*****:***** DOLLARS \$ 40,000.00**

TO
THE
ORDER
OF

COALITIONS FOR AMERICA
717 SECOND STREET NE
WASHINGTON, DC 20002

1699441

00001186 1056004089 65200169944

Acct. No.	Sub No.	Ref. No.	Description	Debit	Credit
1004			FGI c/r 11/12/92	500.00	42.00
4010	20		NATIONAL REPUBLICAN COMMITTEE		

DATE BY CH POSTED.

0414 BATIC PROOF.

JOHNSON, JEFFREY R.

ATTACHMENT THREE

2025.04.29 10:03

National Republican Senatorial Committee

SENATOR PHIL GRAMM
CHAIRMAN

JEB HENSARLING
EXECUTIVE DIRECTOR

October 20, 1992

Mr. Eric Licht
Coalitions for America
717 2nd Street, N.E.
Washington, D.C. 20002

Dear Eric,

I am happy to send you a \$50,000 contribution from the National Republican Senatorial Committee for your Good Government Activities to be used in a manner consistent with your charter. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

Once again, we are happy to provide this support, and we wish you luck in all your endeavors.

Sincerely,



Paul Curcio
Director of Political Services

ATTACHMENT FOUR

2011.01.30.07.00

National Republican Senatorial Committee

SENATOR PHIL GRAMM
CHAIRMAN

JEB HENSARLING
EXECUTIVE DIRECTOR

November 11, 1992

Mr. Eric Licht
Coalitions for America
717 2nd Street, NE
Washington, D.C. 20002

Dear Eric,

I am happy to send you a \$40,000 contribution from the National Republican Senatorial Committee for your Good Government Activities to be used in a manner consistent with your charter. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

Once again, we are happy to provide this support, and we wish you luck in all your endeavors.

Sincerely,



Paul Curcio
Director of Political Services

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Complaint of

Democratic Senatorial Campaign Committee

MUR 3774

GRANTS BY COALITIONS FOR AMERICA, INC.
4Q92

<u>NAME OF GRANTEE</u>	<u>DATE</u>	<u>AMOUNT</u>
LEAGUE OF CATHOLIC VOTERS	NOV 25 92	\$75,000.00
NATIONAL RIGHT TO WORK COMMITTEE	NOV 25 92	\$25,000.00
NATIONAL RIGHT TO WORK COMMITTEE	NOV 27 92	\$35,000.00